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A Tradition of Excellence in Innovation

30 August 2000

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

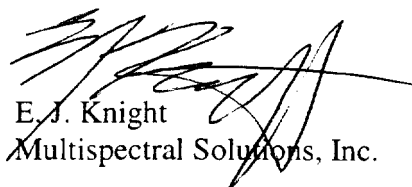
Re: (1) *Ex Parte Notification*, Notice of Proposed Rule Making (FCC 00-163), Revision of Part 15 of the Commission's Rules Regarding Ultra Wideband Transmission Systems
(2) ET Docket No. 98-153 Regarding Ultra Wideband Transmissions

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter are submitted for inclusion in the record.

On 30 August, 2000 the enclosed letter was sent to Chairman Kennard by Dr. Robert J. Fontana, President of Multispectral Solutions, Inc. (MSSI). In this letter, Dr. Fontana requested that the FCC extend the reply period under FCC 00-163 until at least March 15, 2001 and that the reply comment period be extended until April 15, 2001.

Respectfully,


E. J. Knight
Multispectral Solutions, Inc.

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The Honorable William E. Kennard
Chairman, Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Proposed Rule Making (FCC 00-163), Revision of Part 15 of the Commission's Rules Regarding Ultra Wideband Transmission Systems

Dear Chairman Kennard:

As you are aware, the deadline for the submission of comments to the above referenced NPRM on Ultra Wideband (UWB) systems is September 12, with reply comments due by October 12. Unfortunately, results from NTIA tests on the potential for UWB interference to GPS and non-GPS receivers will not be available by either of those dates, forcing all interested parties to comment on the proposed rule making without access to complete and unbiased information.

Only recently (August 8), in fact, has the NTIA been able to submit its GPS/UWB test plan, *Measurement Plan to Determine the Potential Interference Impact to Global Positioning System Receivers from Ultra Wideband Transmission Systems*, for public comment. Section 4.8 of this proposed plan indicates that, barring any unforeseen delays, data would be available for submission to the record only by December 29, 2000. NTIA stated specifically that this timeline was "extremely aggressive" and that this schedule "severely limits the scope of these tests".

Unfortunately, until as recently as 2 days ago, an additional \$600,000 in funding for the NTIA GPS/UWB testing was held up by Senator Shelby (AL). This action has further delayed the progress in obtaining impartial test data which must be made part of the formal record. According to the proposed NTIA schedule, the impact of this delay may extend by another two months the delivery of critical measurement data to the NPRM process.

Thus it has become clear that an extension to the FCC's NPRM deadlines is essential if comprehensive and objective test data is to be made available for consideration by both the FCC and the public prior to a revision to Part 15 rules. Given the recent funding delays, it is unlikely that the NTIA will be able to complete and publish its GPS/UWB measurement plan prior to the end of February 2001 (with an optimistic 2 months schedule slip). Therefore, we respectfully request that the FCC extend the reply period under FCC 00-163 until at least March 15, 2001 with reply comment period extended until April 15, 2001.

Sincerely,

Robert J. Fontana, Ph.D.
President